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6 Attorneys for Plaintiff
GREGORY SHADE

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

1 | GREGORY SHADE,

Plaintiff,

.3 | v.

4 DANIEL PATRICK GORMAN, individually
5 and doing business as CHARLIE SEVEN
FILMS, LLC, FRAMEBIRD MEDIA, CHIP
R. BEASLEY, and ANDREW ELLIS,

Defendants.

CASE NO. CV 08-03471 SI

**DECLARATION OF GREGORY SHADE
IN SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION**

Date: October 10, 2008

Time: 9:00 a.m.

Dept.: Courtroom 10, 19th Floor

Judge: Hon. Susan Illston

Action Filed: July 18, 2008

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1 I, GREGORY SHADE declare:

2 I am the plaintiff in the above-titled action. I have personal knowledge of the facts set forth
3 herein and would competently testify thereto if called upon to do so.

4 1. I am the owner of the registered copyrights to certain compiled video footage and
5 still photographs created during my time in Afghanistan, Uzbekistan, Tajikistan, Turkmenistan and
6 Pakistan in addition to other Central Asian countries following the events of September 11, 2001 at
7 risk of great personal peril and at great expense to me. I estimate that I spent over \$50,000 in out of
8 pocket costs to obtain such video footage and still photographs.

9 2. The copyright registration number for the video footage is PAu003348109. The
10 copyright registration number for the still photographs is VAu000962682. True and correct copies
11 of the filed-endorsed copyright registrations for both the video footage and the still photographs are
12 attached hereto as **Exhibits A and B**.

13 3. I discovered in January of 2008 that the Defendants Daniel Patrick Gorman
14 (“Gorman”), individually and doing business as Charlie Seven Films, LLC (“Charlie Seven
15 Films”), Framebird Media (“Framebird”), Chip R. Beasley (“Beasley”) and Andrew Ellis (“Ellis”)
16 (collectively, “Defendants”), have incorporated my copyrighted materials (both compiled video
17 footage and still photographs) and other intellectual property without my authorization or consent
18 to create a documentary film known to me variously as “*American Hero*” and/or “*For Love Of
19 Country*.[”]

20 4. In early 2003, I decided to turn the footage obtained in Central Asian into a film or
21 other format for future commercial use. Accordingly, I entered into an agreement Defendant
22 Gorman by and through Defendant Gorman’s business entity, Charlie Seven Films, in 2003 to
23 produce a documentary film using Plaintiff’s raw video footage into a documentary film. This
24 agreement was later reduced into writing on or around March 15, 2003. A true and correct copy of
25 the Letter of Intent is attached hereto as **Exhibit C**.

26 5. Specifically, the letter of intent states that I authorized “Charlie Seven Films, LLC
27 (Daniel Gorman) to make use of [my] appearance and to use all video footage and stills
28 provided...” for the proposed documentary film. Furthermore, the letter of intent states that

1 "[c]ontent will be mutually agreed upon by Greg Shade and Daniel Gorman, with final approval by
2 both parties."

3 6. I initially hired and paid Defendant Gorman to compile and edit the raw video
4 footage provided by me into a shorter version for other uses. In scope and course of this
5 engagement, Defendant Gorman compiled, as a work for hire, an edited version of the raw footage
6 that was approximately four hours in length ("compiled video footage"). Additionally, I allowed
7 Defendant Gorman access to my still photographs which were taken contemporaneously with the
8 raw video footage for use in the proposed documentary film. However, for various legitimate
9 reasons, I was dissatisfied with each and every scenario presented by Defendant Gorman.

10 7. Ultimately, Defendant Gorman and I were unable to reach an agreement on the final
11 content of the proposed documentary film. In or about April 2003, I terminated all of my business
12 dealings with Defendant Gorman. In or about April 2003, I demanded the return of all copies of
13 the twenty plus hours of raw video footage as well as any copies of the still photographs and in so
14 doing withdrew my authorization for Gorman and/or Charlie Seven Films to use such materials.

15 8. In response to my demand, Defendant Gorman turned over a number of digital
16 videodisks, which he represented to me as the entirety of my video footage. I relied on Gorman's
17 representations and did not learn until January of 2008 that the digital videodisks contained only
18 the four hours of compiled footage. Unbeknownst to me, Defendant Gorman had surreptitiously
19 retained copies of the raw video footage as well as the compiled and edited footage and an
20 undetermined number of still photographs without my authorization or consent.

21 9. Around the same time, because Defendant Gorman requested permission to use my
22 personal computer to finish the transfer of files as his was no long working. As a result, I gave
23 Defendant Gorman permission to enter vacation home owned by me for to utilize my personal
24 computer. During such time, Defendant Gorman removed property and/or copies of property
25 belonging to me from the home without my authorization and consent. Specifically, Gorman
26 removed computer files from my computer, as well as confidential, proprietary documentary and
27 electronic information relating to my business affairs and my confidential work in Afghanistan,
28 copies of all writings and agreements between me and Defendant Gorman.

1 10. It was not until January 2008, when I first learned of the existence of Defendants'
2 documentary film entitled "*American Hero*," that I discovered that Defendant Gorman had failed to
3 return all copies of the twenty plus hours of raw video footage and had in fact retained the video
4 footage and still photographs for Defendants' own improper use, benefit and profit. It was at this
5 time that I reviewed the videodisks provided by Defendant Gorman and discovered that the disks
6 were incomplete contrary to Defendant Gorman's representations.

7 11. In a news article published in the *SF Weekly* on February 13, 2008, Defendant
8 Gorman admits that the film was made without my approval using the my video footage. A true
9 and correct copy of the February 13, 2008 *SF Weekly* is attached hereto as **Exhibit D**.

10 12. Defendants' documentary film based on my raw and compiled video footage and
11 still photographs was shown under the name *American Hero* at the *San Francisco Indie Film*
12 *Festival* on February 17, 2008.

13 13. I believe that the Defendants engaged in wholesale copying of my copyrighted
14 materials. Such copying is evident upon cursory review of both my original work and the
15 infringing movie. True and correct copies of both my copyrighted materials and the infringing
16 work are attached hereto as **Exhibit E** and **Exhibit F** respectively. Attached as **Exhibit G** hereto is
17 a matrix comparing the location of the infringing material in Defendants' documentary to the
18 location of the identical material on the videodisks deposited with the U.S. Copyright Office.

19 I declared under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct, and that this declaration was executed on July ___, 2008.

GREGORY SHADE

1 10. It was not until January 2008, when I first learned of the existence of Defendants'
2 documentary film entitled "*American Hero*," that I discovered that Defendant Gorman had failed to
3 return all copies of the twenty plus hours of raw video footage and had in fact retained the video
4 footage and still photographs for Defendants' own improper use, benefit and profit. It was at this
5 time that I reviewed the videodisks provided by Defendant Gorman and discovered that the disks
6 were incomplete, contrary to Defendant Gorman's representations.

7 11. In a news article published in the *SF Weekly* on February 13, 2008, Defendant
8 Gorman admits that the film was made without my approval using my video footage. A true and
9 correct copy of the February 13, 2008 *SF Weekly* is attached hereto as **Exhibit D**.
10

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11 still photographs were shown under the name *American Hero* at the *San Francisco Indie Film*
12 *Festival* on February 17, 2008.

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17 a matrix comparing the location of the infringing material in Defendants' documentary to the
18 location of the identical material on the videodisks deposited with the U.S. Copyright Office.
19

I declared under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on July 18, 2008.

GREGORY SHADE

EXHIBIT A

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Register of Copyrights, United States of America

Registration Number:

PAu 3-348-109

Effective date of registration:

June 17, 2008

Title _____

Title of Work: Central Asia Footage

Completion/ Publication _____

Year of Completion: 2003

Author _____

■ **Author:** Gregory O. Shade

Author Created: Camera Work, Script

Work made for hire: No

Citizen of: United States

Year Born: 1952

Anonymous: No

Pseudonymous: No

■ **Author:** Melik Kaylan

Author Created: Camera Work, Script

Work made for hire: No

Domiciled in: United States

Year Born: 1956

Anonymous: No

Pseudonymous: No

Copyright claimant _____

Copyright Claimant: Gregory O. Shade

P.O. Box 986, Corrales, New Mexico, 87048

Transfer Statement: Assignment

Limitation of copyright claim _____

Material excluded from this claim: The words of the persons interviewed not part of this registration.

Previously registered: No

Certification

Name: Jeffrey D. Myers

Date: June 16, 2008

Correspondence: Yes

IPN#: * * .

Registration #: PAU003348109

Service Request #: 1-70066716

Jeffrey Myers
201 Third Street, NW, Suite 1340
Albuquerque, New Mexico 87102

EXHIBIT B

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

* *

Registration Number:

VAu 962-682

**Effective date of
registration:**

May 15, 2008

Title _____

Title of Work: Central Asia Collection

Previous or Alternative Title: Group Registration / Unpublished Photographs (approx 1157)

Nature of Work: Photographs

Completion/Publication _____

Year of Completion: 2003

Author _____

■ **Author:** Gregory O. Shade

Author Created: Photograph

Work made for hire: No

Citizen of: United States

Year Born: 1952

Anonymous: No

Pseudonymous: No

■ **Author:** Melik Kaylan

Author Created: Photograph

Work made for hire: No

Domiciled in: United States

Year Born: 1956

Copyright claimant _____

Copyright Claimant: Gregory O. Shade

PO Box 986, Corrales, New Mexico, 87048

Transfer Statement: Assignment

Limitation of copyright claim _____

Previously registered: No

Certification

Name: Jeffrey D Myers

Date: May 14, 2008

IPN#: 
* *

Registration #: VAU000962682

Service Request #: 1-72367800

**Jeffrey D Myers
201 Third Street, NW, Suite 1340
Albuquerque, New Mexico 87102**

EXHIBIT C

Charlie Seven Films LLC

Letter of Intent

For good and valuable consideration, receipt of which is hereby acknowledged I authorize **Charlie Seven Films LLC** (**Daniel Gorman**) to make use of my appearance and to use all video footage and stills provided for the following production provisionally titled (temporary title) _____ ("Program") and in connection with Charlie Seven Films LLC.

Content will be mutually agreed upon by Greg Shade and Daniel Gorman, with final approval by both parties.

All production alluded to in the above paragraphs will be used for a network documentary film which will be owned in equal parts by **Greg Shade, and Daniel Gorman**, with all production done by **Charlie Seven Films LLC**, who will oversee any and all employment in relation to production.

The documentary will be produced and used along with other materials including News interviews, magazine article write-ups, newspaper articles and the like, to procure funding for a feature film, in which **Greg Shade and Daniel Gorman** will be partners.

This agreement demonstrates good faith intent between the two parties (Greg Shade) and (Daniel Gorman) until a full and comprehensive contract is drafted and signed by both parties within one week of the signing of this document.

1/15/2003

(Please Print) NAME:



Gregory O'Shane

SIGNATURE

DANIEL GORMAN

SIGNATURE

(Please Print) NAME:



3/15/2003

4518 Coal Ave SE
Albuquerque, NM, 87108
505-463-3491
Daniel@kausfx.com

EXHIBIT D

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Osama Hunter Greg Shade Captured on IndieFest Doc *American Hero*

By [Ashley Harrell](#)

Published: February 13, 2008



Subject(s): [Ashley Harrell on terrorist fighter](#)

The New York Post called Greg Shade a "daring Yank" Republican Congressman Dana Rohrabacher, a longtime friend, told CBS that Shade was the "Wild Bill Hickok of the frontier." The Wall Street Journal described him as "untiringly practical" and "a lone idealist." But

Shade — a wealthy real-estate investor who in 2001 traveled to Afghanistan to hunt down Osama bin Laden — is, um, different from how he's been portrayed, says San Francisco filmmaker Daniel Gorman.

Gorman's short film about Shade, *American Hero*, has its world premiere at the S.F. Indie Film Festival on Feb. 17. It's a film that Shade probably doesn't want you to see.

Shade — a 6-foot-4 bear of a man with a thick salt-and-pepper beard — was living in New Mexico in 2002, just after he had returned from his mission in Afghanistan. He had filmed himself riding on camelback through Taliban-controlled territory, distributing thousands of "wanted" posters and T-shirts identifying

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Many say homeless guys who help commuters find street parking provide a valuable service. But others complain that they cause trouble.

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01:17PM 04/04/08

terrorists such as **Osama** bin Laden.

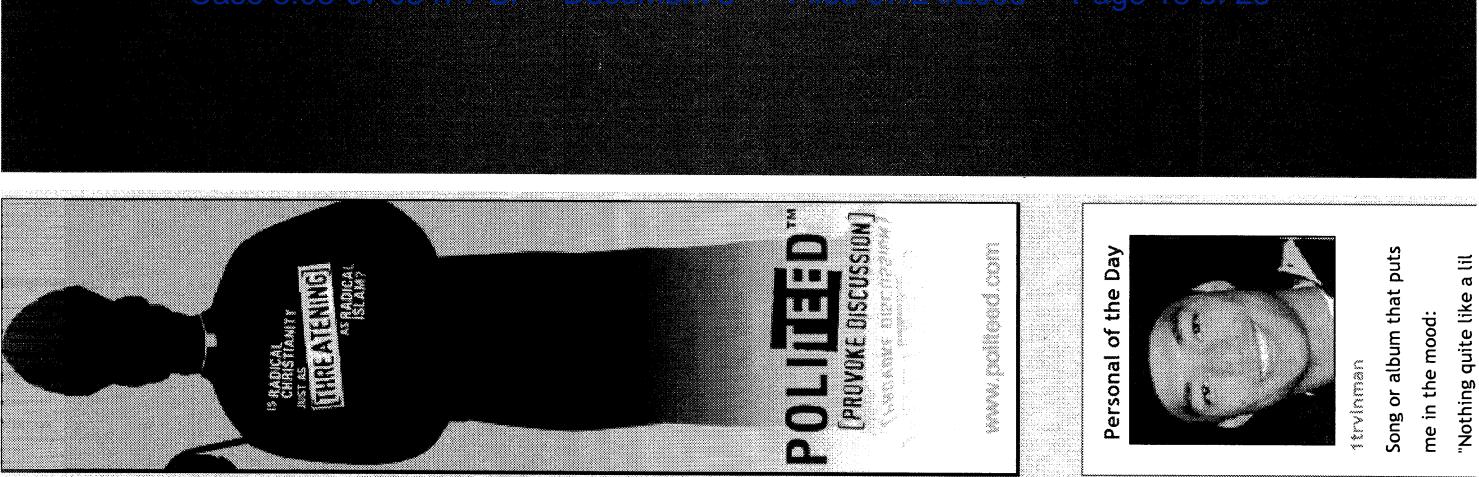
"If you see these people, you want to catch 'em," Shade tells a group of laughing villagers in the film. "You want to grab 'em. If they try to get away, you shoot 'em."

Shade's wife, Roxanne, found Gorman's film editing business in the phone book and had him make copies of Dan Rather reporting Shade's story on CBS in 2002. Shade then asked for help editing nineteen hours of footage he shot in Afghanistan with the intention of creating a 20-minute documentary to show to Congress (Gorman isn't sure what Shade hoped to achieve). They enlisted a screenwriter, Chip Beasley, and started negotiations with a producer from the Discovery Channel.

While working on the project, Gorman visited Shade's home in Rio Rancho, which included a large shower fully encased in a fish tank and mosaic floor tiles arranged in the outline of a naked, large-breasted, spread-eagled woman. "At that point, I thought he was just eccentric," says Gorman, who splits his time between Sebastopol and San Francisco. It was when the two men traveled to Washington, D.C., to visit members of Congress, that things began to get really bizarre.

When Gorman arrived at their hotel room, Shade was "absolutely loaded," Gorman remembers. Shade also expressed concern that the CIA was watching them. Then he suggested they go to a strip club.

The next day, the two went to Capitol Hill and distributed copies of an initial version of their film to several congressmen. Shade told Gorman he'd see him later, because he had an underground meeting with the CIA. Eye scanners were apparently involved. "He felt he was a James Bond character," Gorman says.



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The Murder of Walter Bo In a city plagued by killings, the most perplexing death is that of a killer.
By Tamara Lush

1trvman
Song or album that puts me in the mood:
"Nothing quite like a lit

Over the next four days in D.C., Gorman filmed Shade in their hotel room for the Discovery Channel documentary. But problems soon arose. Shade, an editing novice, had impossible demands for how the film should look. The two butted heads over musical selection (Shade was in favor of using songs such as Rod Stewart's "Forever Young"). It ended badly, Gorman says, with Shade telling Gorman that the CIA would rape Gorman's wife and kill him. Although Gorman is unmarried, he decided Shade was unstable and cut off the relationship.

Gorman put his film on the back burner for several years, until a friend suggested he make it into a short documentary and enter it in the S.F. Indie Film Festival. Though he questioned the ethics of doing so without Shade's approval, Gorman ultimately decided Shade's story was too important not to be told. He was mad that politicians like Rohrabacher and reporters were championing the efforts of a potentially homicidal madman.

SF Weekly was unable to reach Shade for comment. However, a journalist he befriended in Uzbekistan last year called on his behalf. Melik Kaylan, a freelance culture writer for the *Wall Street Journal*, said he had heard from one of Shade's realtors that the *Weekly* was trying to contact Shade. Shade is out of the country on a secret mission, possibly in Burma, Kaylan said, and apparently cannot be reached. A story about him (or a documentary, for that matter) might endanger his life, Kaylan continued, in an obvious attempt to dissuade me from writing the story.

Kaylan isn't the only one with a soft spot for Shade. Gorman acknowledges that Shade seemed like an intelligent, entertaining guy with the best of intentions. "He's the type of person you make a film *about*. You don't work on a documentary film *with* him. I learned that the hard way."

Gorman worries that Shade might hurt himself or somebody else. In one particularly telling scene in the film, a shirtless Shade discloses from his hotel bed that he's disappointed that the U.S. Army hasn't shut down heroin operations in Afghanistan. He thinks aloud about how they would look "like stupid fuckers" if he were to do his "duty."

"He goes himself and fuckin' murders all the bad guys," Shade says, sounding serious. "Kills Taliban right and left. Stops heroin production that adds up to a billion dollars a year. That's a nice way to end it."

- Nashville Scene

Spank the Honkey
The victim of a racial slur exacts a special kind of retribution.
By P.J. Tobia

Broward-Palm Beach
New Times

Spring Break is Still Awesome
Try as it might, Ft. Lauderdale still can't shake America's die-hard partiers.
By Michael J. Mooney

bawm-chika-bawm-
bawm. Kidding."

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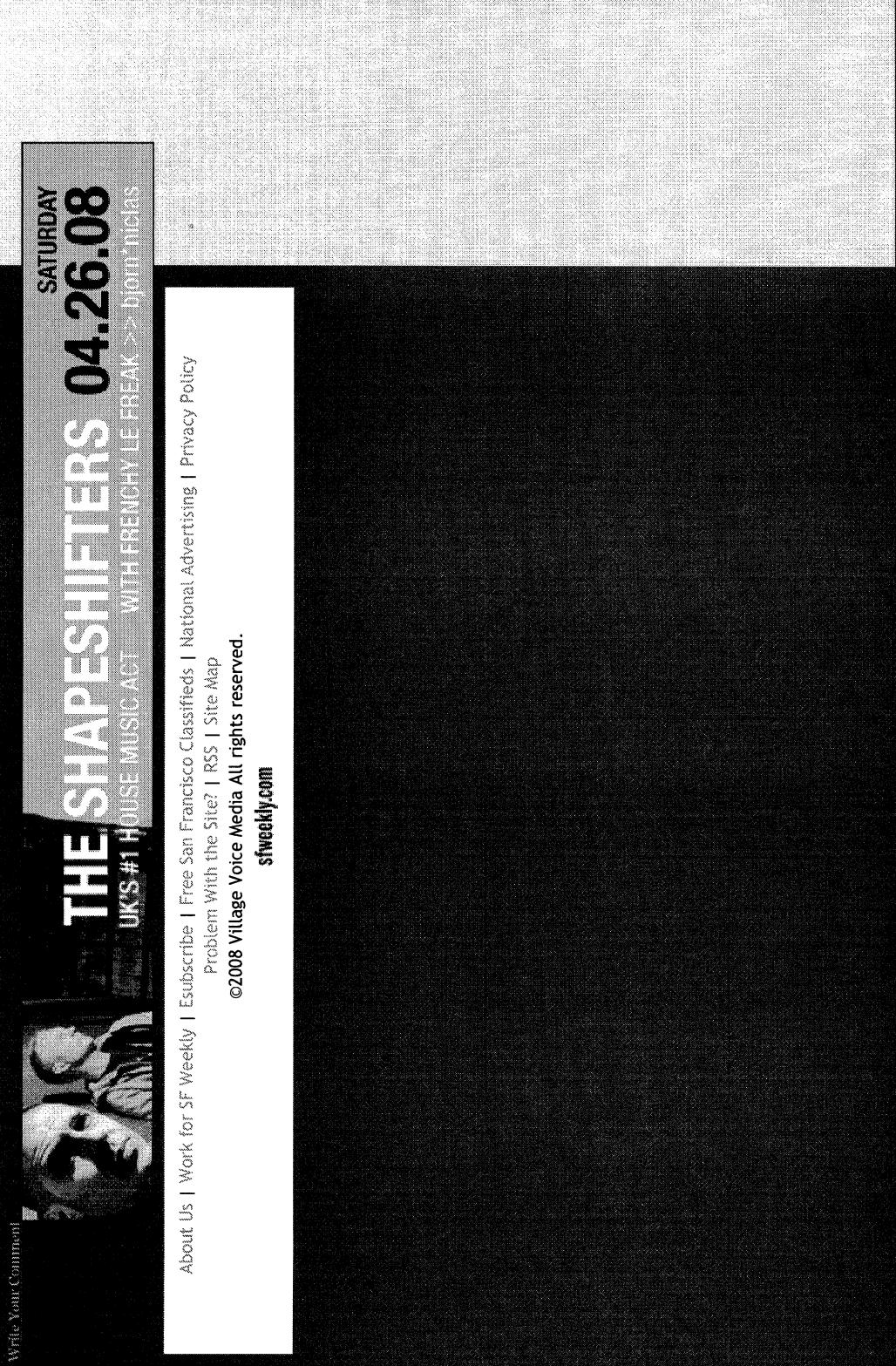
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THE SHADE SHATTERS 04.26.08

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EXHIBIT E

(DVDs to be manually filed.)

EXHIBIT F

(DVDs to be manually filed.)

EXHIBIT G

EXHIBIT G

Documentary Time Stamp	Description	Registered Materials and Location of Materials Showing Infringement
0:00:05-0:00:29	CBS clip: intro to Greg Shade Story "Pursuing Bin Laden (All CBS clips appear framed in cartoon television illustration.)	
0:00:30-0:00:54	Interview Shade eating bread and kebab talking about Taliban, gun runners and military being a dangerous mix.	Disc One, Pal Conversion 1- 0:00:00-0:00:44 Disc Three, Chapter 2- 0:03:01-0:03:22 Disc Four, Chapter 1- 0:02:04-0:02:28
0:00:55-0:01:04	Overdub commentary (Gorman?) swirling material (9/11 explosion?)	
0:01:05-0:01:08	Still of Shade talking to Asian male and Caucasian female. Caption America at War, Man on a Mission, MSNBC.	
0:01:12-	Still of young Shade holding an automatic weapon.	
0:01:19	Still of Shade. Caption: Live, America At War, Greg Shade, Entrepreneur, MSNBC.	
0:01:22-0:01:25	Moving profile clip of tank in desert environment.	Disc One, Pal Conversion 1- 0:22:29-0:22:45 Disc Four, Chapter 2- 0:36:55, 0:37:20, 0:37:51, 0:38:32, 0:38:34
0:01:26	Clip of Shade in Bed (purportedly a Washington DC hotel).	
0:01:33-0:01:39	Still of Shade in turban pointing handgun at camera.	Shade Stills: Folder 5: DSC01744
0:01:40-0:02:13	Night camera footage of black bearded man heavy accent talking to Shade while riding in a vehicle "belly of Kundos" Partial Map overlay for final seconds of shot.	Disc One, Pal Conversion 1- 0:14:40 Shade talks about the "Belly of Kundos" Disc Three, Chapter 2- 0:06:30-0:07:10 Disc Four, Chapter 1- 0:06:12-0:06:22 Map: (samangan)
0:02:20-0:02:30	Title: We are all, nonetheless, constantly engaged in artful acts of self deception." Sigmund Freud.	
0:02:31-0:03:03	Night camera footage of dirt road and shots of driver. Shade asks "is it thieves or Taliban or both." Town members support Taliban. Subtitled.	Disc One, Pal Conversion 1- 0:12:05-0:12:35 Disc Four, Chapter 1- 0:05:32-0:06:13

EXHIBIT G

Documentary Time Stamp	Description	Registered Materials and Location of Materials Showing Infringement
0:03:04-0:03:30	Night Camera footage of Shade: "I am here in a hotel in the Pushtan area. Referencing bodyguards."	Disc One, Pal Conversion 1- 0:17:28-0:19:06 Disc Three, Chapter 2- 0:07:11-0:08:00 Disc Four, Chapter 1- 0:06:14-0:07:07
0:03:31-0:04:55	Video of Shade (caption reads: later that night) downstairs at hotel singing along with "cowboy" music and asking an off camera person to translate to room full of people.	Disc One, Pal Conversion 1- 0:47:14-0:53:50 Disc Three, Chapter 2- 0:19:55-0:21:18 Disc Four, Chapter 1- 0:18:41-0:20:06
0:04:55-0:06:15	News clip: shade passing out wanted posters, American flags, and anti Osama Bin Laden t-shirts.	Disc Four, Chapter 2- 0:24:29-0:26:43
0:06:16	Caption: For Love of Country	
0:06:21-0:06:37	Sunset clip of men riding camels.	Disc Four, Chapter 2- 0:36:12-0:36:26
0:06:38-0:08:34	Shade asking off camera person to translate to group of on-camera men that the US Government offers a reward to men on list (in Shade's hand) that may pass through area. Translator responds that men on screen do not support Taliban.	Disc One, Pal Conversion 1- 00:23:10-29:38 Disc Three, Chapter 2- 0:09:01-0:12:41 Disc Four, Chapter 1- 0:08:05-0:11:42
0:08:35-0:08:45	Clip in cartoon TV (CBS News clip?) Interview of Shade in Suit that he went places others did not.	
00:08:46	Caption: Afghanistan	
0:08:49-0:09:14	Subjective view of desert from moving vehicle, clip of tank (see above), clip of man looking into back of covered vehicle while man in vehicle speaks; street view from vehicle; turbaned man outside counting money; children's vertical merry-go-round; group riding camels through desert; man riding donkey pulling a man in a cart through city street; close up of person with stocking cap; trucks; man pushing kids merry-go-round type swing; clip of camels walking in city.	Disc One, Pal Conversion 1- 00:1:00; Disc One, Pal Conversion 2- 0:23:35-0:28:28 shows street view from vehicle, man riding donkey pulling a man in a cart through the city, close up of person with stocking cap and camels walking in city. Disc Four, Chapter 1- 0:01:40-0:02:08 shows turbaned men counting money Disc Four, Chapter 2- 0:38:59 shows kids w/ merry-go-round type swing.

EXHIBIT G

Documentary Time Stamp	Description	Registered Materials and Location of Materials Showing Infringement
0:09:15-0:09:32	News clip framed in cartoon TV (CBS?): Commentator states that Shade claims that he is not a Federal operative, but does share information with officials like Congressman Dana Roerbacher. Interview of Roerbacher: "Shade is a modern day Wild Bill Hickock."	
0:09:33-0:10:03	Shade in bed (DC Hotel): Off camera person asks: About canvassing heroin producing facilities and Shade's plan. Response: We don't want to talk about the heroin stuff too much. We want to murder them." Cut shot.	
0:10:04-0:10:22	Roerbacher still: voice recording: Patriots are mercenaries and Greg is a mercenary, unpaid and idealistic.	
0:10:23-0:10:32	Shade in DC bed: you're going to meet my hooker girls.	
0:10:33-0:10:42	CBS Clip Cartoon TIV: Shade in suit: I am not Arnold Schwarzenegger, just Greg. Ultimately the American agents will do their job.	
0:10:42-0:11:12	Clip of Shade with no shirt explaining why he applies eye makeup to blend in.	
0:11:15-0:11:23	Still: head shot of Shade in Turban looking to his right.	Shade Stills: Folder 3: DSC01856
0:11:23-0:11:33	Still: small clips of Greg in local clothing on a camel, Clip of 2 unidentified Caucasian men (both with short beards, one with baseball cap).	Shade Stills: Folder 5: DSC 01419 Shade Stills: Folder 5: DSC 0142
0:11:34-0:11:42	Clip: subjective view of rugged terrain and river, possibly from helicopter.	Disc Two, Chapter 2- 0:10:07-0:10:22
0:11:43-0:11:51	Clip of person riding donkey pulling a man on a cart through the city (see above).	Disc One, Conversion 2- 0:23:35-0:28:28
0:11:53-0:11:59	Subjective view of man's sandals walking draped in American flag.	

EXHIBIT G

Documentary Time Stamp	Description	Registered Materials and Location of Materials Showing Infringement
0:11:60-0:12:05	Shade wearing down jacket shaking hands with locals.	Disc One, Conversion 1- 0:31:47-0:32:36 Disc One, Conversion 1- 0:59:25-1:00:25 Disc Three, Chapter 2- 0:13:20-0:13:45 Disc Three, Chapter 2- 0:21:19-0:21:47 Disc Four, Chapter 1- 0:11:44-0:12:45 Disc Four, Chapter 1- 0:20:07-0:20:34
0:12:07-0:12:10	Shade riding camel with American flag on camel.	Disc One, Pal Conversion 2- 0:13:14-0:13:37 Disc Two, Chapter 1- 0:01:09-0:02:54 Disc Two, Chapter 4- 0:15:36-0:17:18
0:12:14-0:12:21	Night shot of Shade sitting in tent talking with locals.	Disc One, Pal Conversion 2- 0:02:41-0:10:03 Disc One, Pal Conversion 2- 0:42:48-0:55:06 Disc Three, Chapter 2- 0:32:41-0:42:57 Disc Four, Chapter 2- 0:10:32-0:21:10
0:12:25-0:12:30	Shade wearing down parka with bearded man in western dress standing in front of cave.	Disc Three, Chapter 2- 0:17:43-0:18:22 Disc Four, Chapter 1- 0:16:31-0:17:10
0:12:33-0:12:55	Backing away shot of Minivan backing up to cave or tunnel surrounded by snow covered ground then panning up to ridge top.	Disc Four, Chapter 2- 0:36:48
0:12:59-0:13:39	Camels walking through the desert; Still, Shade riding camel; shot of desert dune.	Disc Four, Chapter 2- 0:32:02-0:34:02 Shade Stills Folder 1: DSC00358 (Still of Shade Riding camel.)
0:13:41-0:13:53	Cartoon TV Clip: Shade describing passport visas as camera shows close up of his hand turning the pages of his passport. Reporting stating that Shade claims that American business people finance his trips, but he won't say who for fear of terrorist reprisal. Clip of Shade using a map to describe intended route to two sitting men.	
0:13:54-0:14:11	DC Hotel Room: interviewer asks question, Shade responds doesn't want guys in congress to think Shade spilled the beans.	

EXHIBIT G

Documentary Time Stamp	Description	Registered Materials and Location of Materials Showing Infringement
0:14:12-0:15:10	Shade sitting with man described as the general in charge of security over Mazar-e Sharif looking over map (same clip as above). Going through map to understand where Shade can distribute wanted posters and what areas are off limits. Shade states that he does want to kill innocent people.	Disc Three, Chapter 2- 0:00:42-0:01:30 Disc Four, Chapter 1- 0:00:27-0:01:16
0:15:10-0:16:21	DC Hotel Room: Shade talking about returning to terrorist region to kill heroin producers and Taliban if the US Government won't.	
0:16:22-0:17:05	Children on hanging merry go round in City environment. Children laughing yelling on swings. Man pushing merry go round looking at camera.	
0:17:06-0:17:20	Cartoon TV: Greg holding Osama Bin Laden Wanted t-shirt in front of CBS correspondent. Correspondent describing how Shade claims he passed out wanted posters in the area where Kalid Shek Mohammed was captured.	
0:17:21-0:18:01	DC Hotel: Shade in bed talking on cell phone. Talking about being in the same area as Mohammed.	
0:18:02-0:18:15	Cartoon TV: correspondent (Bob McNamara in New Mexico) any questions about Shade's unconventional ways will vanish Shade states if Bin laden is soon captured. Clips of Shade footage.	
0:18:16-0:19:01	Credits: Shade in hotel with Willie Nelson track. Type: A Daniel Gorman Film; Written by Daniel Gorman and Chip Beasley; Edited by Daniel Gorman; Graphics by Kemper Barkhurst; Sound Editing: Jeff Mahoney/Burning Token Records; Additional Photography: Lorrie Latham;	
0:19:02-0:19:30	DC Hotel: Shade in bed talking on cell phone: Greg is on an island someplace, or in his tree fort in Cambodia.	
0:19:30-0:19:50	Black Screen, middle eastern traditional music.	